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## MEMO ENDORSED

March 31, 2020

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### VIA ECF

The Honorable Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Trial adjourned until 10/19/2020 at 9:30 although that date may have to be adjusted. As the interests of justices served thereby outweigh the interests of the defendant and the public in a speedy trial in light of the COVID-19 crisis and the limitations on the conduct of jury trials and trial preparation, time is excluded to and including 10/19/2020 *Terrence*  
Dated: 4/1/2020 *DI 39.*

Re: *United States v. Sylvia G. Ash*, 1:19-cr-00780 (LAK)

Dear Judge Kaplan:

We represent defendant Sylvia G. Ash in the above-referenced case. We write regarding the March 27, 2020 Southern District of New York Standing Order that suspends all jury trials until June 1, 2020 because of the current COVID-19 pandemic ("Standing Order").

Trial in this matter is currently scheduled to begin on May 18. In light of the Standing Order and in the hope that further rescheduling can be avoided, Ms. Ash respectfully requests that the first day of trial in this case be rescheduled for October 19, 2020. We have conferred with the government regarding the rescheduling of the trial and the government consents to this request. Ms. Ash also requests that time be excluded under the Speedy Trial Act between May 18, 2020 and October 19, 2020, should the Court order trial to begin on that date.

Respectfully Submitted,

Carrie H. Cohen

cc by ECF: AUSAs Daniel Richenthal and Eli Mark  
G. Michael Bellinger, Co-Counsel for Sylvia G. Ash